## EXHIBIT 31

Joseph Bruneau 5020 Carson Ave. SW Grand Rapids, MI 49548

March 24, 2017

Dear Mr. Kwiatkowski:

On February 11, 2016, I was served a notice of trespass at Aquinas College. It has been over a year since this notice was given, and I would like the restrictions highlighted in it to be lifted.

I would need to be able to visit the campus and contact members of the Aquinas community in order to continue my education at Aquinas College. Thank you for your consideration.

Yours truly,

Joseph Bruneau

JOSEPH BRUNEAU

Joseph Bruneau 5020 Carson Ave. SW Grand Rapids, MI 49548

May 31, 2017

Dear Mr. Kwiatkowski:

On February 11, 2016, I was served a notice of trespass at Aquinas College. It has been over a year since this notice was given, and I would like the restrictions highlighted in it to be lifted.

I would need to be able to visit the campus and contact members of the Aquinas community in order to continue my education at Aquinas College.

This is my second time making this request. I would appreciate a response. Thank you in advance.

Yours truly,

Joseph Bruneau

Joe Bruneau <joe\_bruneau@yahoo.com> To kwiatkev@aquinas.edu

Jul 14, 2017

Dear Mr. Kwiatkowski:

Thank you for your reply to my request to access the campus. The Notice of Trespass you forwarded to me states:

A Notice of Trespass may be issued by Aquinas College to any person that the Department of Campus Safety directly observes or receives a complaint about who meets any of the following criteria:

- causes harm or inflicts injury to members of the College community
- threatens, harasses or intimidates members of the College community
- disrupts academic and administrative business of the College
- **a** causes damage to College property or the personal property of members of the College community
- a commits serious or other criminal activity
- violates College policy
- Providing false information to College officials

I didn't commit any of those infractions during my brief stay on campus on February 11, 2016. With that in mind, could you please explain to me how you reached your decision to continue your order which forbids me from accessing the campus?

Thank you,

Joe Bruneau

Sept 20, 2017

To: dee.wagner@aquinas.edu

On February 11, 2016, I received a notice of trespass at Aquinas College, which prohibited me from making future visits to the campus.

On March 24, and May 31, 2017, I wrote letters to Director of Campus Safety, Kevin Kwiatkowski, asking that the restriction prohibiting me from visiting the campus be lifted.

His letter of June 29, 2017 denied my request, and he provided his email address if I had further questions.

On July 14, 2017 and again on July 31, 2017, I sent Mr. Kwiatkowski the following email:

Thank you for your reply to my request to access the campus. The Notice of Trespass you forwarded to me states:

A Notice of Trespass may be issued by Aquinas College to any person that the Department of Campus Safety directly observes or receives a complaint about who meets any of the following criteria:

- **a** causes harm or inflicts injury to members of the College community
- threatens, harasses or intimidates members of the College community
- disrupts academic and administrative business of the College
- **n** causes damage to College property or the personal property of members of the College community
- commits serious or other criminal activity
- violates College policy
- Providing false information to College officials

I didn't commit any of those infractions during my brief stay on campus on February 11, 2016. With that in mind, could you please explain to me how you reached your decision to continue your order which forbids me from accessing the campus?

I have yet to receive a response from Mr. Kwiatkowski.

I hope to be able to continue my education at Aquinas College. In order to do this, I would need to have the order lifted. I hope you will agree with the reasoning that I touched on in the above email that there is no reason the order prohibiting me from accessing the campus should not be lifted. Anything you could do to help me get the order lifted, or direct me to the proper department would be greatly appreciated.

Thank you,

Joe Bruneau Tr

Brian Matzke <bri>drian.matzke@aquinas.edu>

Oct 25, 2011

Dear Mr. Matzke:

Thank you for your response. You maintain my behavior was intimidating, harassing and disruptive. That's just not true. Please let me know what evidence you are relying on to make that judgement. Any documentation you have in support of supposed evidence would be appreciated as well.

Thank you,

Joe Bruneau <joe\_bruneau@yahoo.com> To

Nov 7, 2017

Mr. Matzke, the matter is not closed. I was for a number of years an Aquinas student in good standing, and plan to be once again. The GRPD charged me only with trespassing. You claim my behavior was harassing, intimidating and disruptive. The only time I've heard of these allegations were in your email of October 19. As I've told you, these allegations are without merit. An accused person has a basic and almost universally accepted right to review evidence of allegations against him. I understand why you are reluctant to provide any evidence, it is because the actions did not take place. So for this reason I am asking, again, that you lift my restriction on visiting the campus.

## Joe Bruneau <joe\_bruneau@yahoo.com> To officeofthepres@aquinas.edu

Nov 29, 2017

## Dear President Quinn:

On February 11, 2016, I was served a notice of trespass at Aquinas College, which prohibited me from making future visits to the campus. I have been in contact with Brian Matzke about getting this restriction lifted. I would need to be able to visit the campus and contact members of the Aquinas community in order to continue my education at Aquinas College.

Mr. Matzke would not overturn the order, stating: "The behavior identified was harassing, intimidating and disruptive to our students and other patrons of the College and our library. Your status with the College will remain as is."

Mr. Matzke's allegation that my behavior was harassing, intimidating and disruptive is without merit. I was charged with trespassing and trespassing alone by the GRPD. I have asked Mr. Matzke to provide a source of evidence for his allegations, but he refused. He now seems unwilling to discuss the matter with me further. So I am asking you to rescind the order that I not visit the campus in the future so that I may further pursue my education at Aquinas College.

Thank you,

Joe Bruneau <joe\_bruneau@yahoo.com>

Dec 6, 2017

Thank you for responding to my email.

The first time I was accused of harassing, intimidating and disruptive behavior was in Mr. Matzke's email of October 19. I believe those accusations are false. I've requested Mr. Matzke provide information on the origin of these accusations and any evidence to support them, and he refused. Do you really believe that I am not entitled to such information? I think of it as a basic right of an accused individual.

Essentially, you are saying to me: "We are maintaining a restriction on you because of questionable accusations that we refuse to provide any evidence of." Does this sound right to you? If you intend to continue with this course of action, I'd like to know how you justify it.